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YIMI VALDOVINOS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

YIMI VALDOVINOS,

Plaintiff,

vs.

WALMART, INC., and DOES 1-50, inclusive,

Defendants.

Case No. 2:20-cv-0222-KJM-DMC

**STIPULATION AND ORDER TO CLARIFY
OPERATIVE PRETRIAL DEADLINES**

Removal Date: January 29, 2020
Trial Date: TBD

IT IS HEREBY STIPULATED AND AGREED by and between all parties, through their counsel of record, as to the following:

1. On January 29, 2020, Defendant Walmart Inc. ("Defendant") removed the above captioned matter to United States District Court for the Eastern District of California.

2. The Court issued its Initial Pretrial Scheduling Order on April 2, 2020, with the following relevant deadlines [DKT 9]:

Event	Date
Designation of Expert Witnesses	June 15, 2021
Designation of Rebuttal Expert Witnesses	July 6, 2021
Fact Discovery Cut-Off	July 13, 2021
Expert Discovery Cut-Off	August 6, 2021
Last Day for Dispositive Motions to be Heard	September 13, 2021

3. On December 29, 2020, the Plaintiff Yimi Valdovinos and Defendant (collectively, "the parties") submitted a stipulated request to continue the mediation deadline and to continue pre-trial dates according to the new mediation deadline [DKT 17]. On January 4, 2020, the Court granted the parties' request with the following continued relevant deadlines [DKT 18]:

Event	Date
Designation of Expert Witnesses	October 7, 2021
Designation of Rebuttal Expert Witnesses	October 28, 2021
Fact Discovery Cut-Off	November 4, 2021
Expert Discovery Cut-Off	November 24, 2021
Last Day for Dispositive Motions to be Heard	January 5, 2022

4. On September 2, 2021, the parties submitted a stipulated request for a 120-day continuance of all pretrial deadlines [DKT 20]. On September 8, 2021, the Court granted the parties'

request and continued the mediation deadline by 120 days, which also continued all pre-trial deadlines by 120 days, with the following continued relevant deadlines [DKT 21]:

Event	Date
Designation of Expert Witnesses	February 4, 2022
Designation of Rebuttal Expert Witnesses	February 25, 2022
Fact Discovery Cut-Off	March 4, 2022
Expert Discovery Cut-Off	March 24, 2022
Last Day for Dispositive Motions to be Heard	May 5, 2022

5. On March 22, 2022, the parties submitted a stipulated request for a 120-day continuance of all pretrial deadlines [DKT 24]. On March 25, 2022, the Court granted the parties' request, with the following continued relevant deadlines [DKT 25]:

Event	Date
Designation of Expert Witnesses	June 3, 2022
Designation of Rebuttal Expert Witnesses	June 24, 2022
Fact Discovery Cut-Off	July 1, 2022
Expert Discovery Cut-Off	July 22, 2022
Last Day for Dispositive Motions to be Heard	September 2, 2022

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6. The Court's March 25, 2022 Order, which was the proposed order submitted by the parties, did not contain any specific reference to the operative continued pre-trial deadlines. The parties stipulate that pursuant to the Court's March 25, 2022 Order [DKT 25], the above referenced deadlines are the current operative pre-trial deadlines in this matter.

DATED: April 14, 2022

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: 

James T. Conley
Robert C. Rodriguez

Attorneys for Defendant
WALMART, INC.

DATED: April 15, 2022

BOHM LAW GROUP, INC.

By: /s/ Daniel T. Newman

Daniel T. Newman

Attorney for Plaintiff
YIMI VALDOVINOS

ORDER

Pursuant to the Court's March 25, 2022 Order [DKT 25], and the parties' current stipulation, the current operative pre-trial deadlines are as follows:

Event	Date
Designation of Expert Witnesses	June 3, 2022
Designation of Rebuttal Expert Witnesses	June 24, 2022
Fact Discovery Cut-Off	July 1, 2022
Expert Discovery Cut-Off	July 22, 2022
Last Day for Dispositive Motions to be Heard	September 2, 2022

Dated: April 20, 2022



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE